

I am an independant consultant in Rochester, Ney York. I offer netwrok design, project management and e-rate filing assistance to my clients. I assist many School dDistricts in their preparation of e-rate documents including obtaing the necessary Request for Quotes from canidate vendors of services. Six of my clients have non-carrier provided fiber networks linking schools within their District.

It is my observation, experience and thus my opinion that dark fiber networks should remain an elibigle service within the Telecommunications category of the e-rate program. I argue this based on the following.

1.) Dark fiber is consistant with the FCC's objective of driving electronic communication into the teaching and learning experience. Connectivity, bandwidth, is a pacing factor in electronic communication. Without ample bandwidth a service is either non-existant or too slow to be readily accepted by teachers or students. Dark fiber enables a School District to quickly add bandwidth based on their own needs and experience without being held hostage to a vendors pricing tactics to improve profits. Teacher and student acceptance of electronic communications into the cirriculum is much faster when the District is able to modify bandwidth quickly without additional expense. Dark fiber is the only media that provides this capability. Without further comunication cost or delay the District can modify bandwidth from modest speed to high speed.

2) Dark fiber expands competition. In the absence of non carrier provided dark fiber significant quanities of bandwidth is only aavailable from the local telephone company. In a non competitive environment prices rise and erode the ability of a District to afford the bandwidth to foster electronic communications into the teaching and learning experience. To maintain the competitive requiremets that has served the e-rate program so well dark fiber should remain an eligible solution. My experience universal supports the conclusion that the existence of a dark fiber alternative reduces the cost of all high speed services offered to the Districts.

3.)My experience universal supports the conclusion that the total life cycle cost of dark fiber, including the cost of connected data transmission equipment, is vastly lower than similar bandwidth services offered by common carriers.

4.)All common carrier high bandwidth services are offered over fiber. To differentiate the functionality of a service based on ownership or end equipment (lighting electronics) is illogical and harkens to the day of tight regulation of the telecommunications marketplace. Communications in the US has matured far beyond this state. Fiber is fiber regardless of who or what lights the fiber making it useable. It would be a great injustice to restrict the functionality gained and the student benefits of high bandwidth based on the physical condition, light or dark, of a standard communications medium.

5.) There is no advantage, cost or performance or reliability between light or dark fiber. Bandwidth over fiber is, or should be, a commodity priced service. There is no reason to force schools to pay more for no additional benefits.

6.) The e-rate program continues to lead the Districts to embrace the concept of electronic communication within the teaching and learning experience by greatly reducing the cost of required services. The FCC should make every effort to structure the e-rate program to foster the reduction of costs and the increase of services and equipment whenever possible.

7.) No one is harmed by the existence of dark fiber within the e-rte program. The schools and students benefit, the new vendors benefit and the common carriers benefit by being forced to compete in an unregulated world by reacting to the more efficient engineering and provisioning of their competitors. Telephone companies must abandon their century old methods of requiring all their facilities, wire or fiber, to be routed back to their hub central office. Vendors of dark fiber route the fiber in as short a distance as possible. Thus cost to the School Districts are much lower.

Thank you.

Robert Cooper